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May 13, 2024

Hon. Cecelia G Morris  
United States Bankruptcy Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

**In Re:** Brad Kalmanson and Cristina Kalmanson  
**Case No.:** 23-22307-cgm  
**Chapter:** 13  
**Property Address:** 160 14<sup>th</sup> Street, Verplanck, NY 10596

Dear Judge Morris,

This firm represents Nationstar Mortgage LLC (“Nationstar”), a secured creditor of the above-named Debtor. On October 13, 2023, a Loss Mitigation Order [Doc No. 40] was entered by this Court. We respectfully request that the below serve as a status update on the aforementioned loss mitigation proceeding. The Loss Mitigation conference is scheduled for May 22, 2024 at 9:00 AM.

On December 12, 2023, a blank Loss Mitigation package was emailed to Debtor’s Counsel. On February 1, 2024, Debtor’s Counsel provided Loss Mitigation documents for review. On February 1, 2024, Debtor’s Loss Mitigation documents were forwarded to Nationstar for review. Nationstar reviewed the Loan Modification documents and determined the Loss Mitigation application was not included and requested the Loss Mitigation application (Uniform Borrower Assistance Form and 4506C Form). On February 26, 2024, Debtor’s Counsel provided the completed Loss Mitigation application and 4506C form. Nationstar reviewed the Loss Mitigation documents, and advised they need the following documents: (1) Recent P&L Statements, (2) Contributor’s full social security number and (3) Contributor’s recent consecutive paystubs with gross YTD earning.

On March 12<sup>th</sup>, our office requested Debtor’s Counsel provide the missing documents. Debtor’s Counsel has not provided the missing documents. As it is now May 2024, it is likely that previously submitted documents have expired. Therefore, Debtor’s Counsel needs to submit an updated application that included updated paystubs, P&L statements, bank statements and any other supporting documentation needed. Thank you for your consideration of this matter. Please do not hesitate to contact me with any questions regarding the matter.

Respectfully,

/s/ Raquel Felix

Raquel Felix, Esq.

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cc: Todd S. Cushner, Esq. (via ECF)